

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION (TOLEDO)**

On the Beach Boutique, LLC, *et al.*

Plaintiffs,

v.

Marissa Haynes,

Defendant.

Case No. 3:22-cv-00578-jz

Judge Jack Zouhary

PROPOSED JOINT PERMANENT INJUNCTION

To settle the matter, and subject to a confidential written settlement agreement over which this Court retains jurisdiction, the parties agree that Defendant Marissa Haynes, or any company Defendant may own or operate, shall be **PERMANENTLY ENJOINED** from issuing and/or submitting any copyright takedown notice under 17 U.S.C. § 512 without seeking the advice of competent copyright counsel as to whether:

- 1) Defendant, or any company Defendant may own or operate, owns the copyright to the work allegedly being infringed; and
- 2) the work owned by Defendant, or any company Defendant may own or operate, is being infringed.

Defendant Marissa Haynes expressly denies any liability related to the facts and circumstances of this case.

IT IS SO ORDERED.

JACK ZOUHARY
UNITED STATES DISTRICT JUDGE